

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Lisa Rose Mariani  Debtor(s) Lisa Rose Mariani	Chapter 13 Proceeding 17-13760-MDC
v. AJAX Mortgage Loan Trust 2021-G, Mortgage-Backed Securities, Series 2021-G, By U.S. Bank National Association, As Indenture Trustee  Movant  Respondent	

**CONSENT ORDER TO CONTINUE THE REINSTATEMENT OF THE STAY**

Upon consideration of the Debtor's Motion to Reinstate Automatic Stay and AJAX Mortgage Loan Trust 2021-G, Mortgage-Backed Securities, Series 2021-G, By U.S. Bank National Association, As Indenture Trustee's ("Respondent") Objection to the same, the parties hereby agree as follows:

1. Debtor's Motion to Reinstate Automatic Stay relating to the property located at 135 Grandview Road, Ardmore, PA 19003 was granted on October 27, 2021, effective October 19, 2021 through December 30, 2021.
2. Debtor and Respondent are in agreement to continue the Reinstatement of the Stay until further motion or court order to the contrary.
3. On November 3, 2021, the parties entered into a Forbearance Agreement – 6 Month Trial Period (hereinafter referred to as the "Forbearance Agreement". A true and correct copy of the Forbearance Agreement is attached hereto as Exhibit "A".
4. Under the terms of the Forbearance Agreement, Debtor agrees to make monthly trial plan payments in the amount of \$2,161.59 beginning with the December 1, 2021 payment and continuing though and including the May 1, 2022 payment.
5. Under the terms of the Forbearance Agreement, Respondent agrees, that if all trial plan payments are timely made and Debtor does not default under any other terms of the Forbearance Agreement, and the loan documents including but not limited to, the Note and/or Mortgage, a final modification agreement will be offered to Debtor. Respondent further

agrees, that if a final modification is entered into, and after it is approved by this Bankruptcy Court, that Respondent shall terminate any pending foreclosure action. Debtor also agrees that any steps taken to do so, including but not limited to vacating the Judgment and dismissing the Foreclosure action, will not be a violation of the stay.

6. In the event that Debtor completes the trial plan payments and a final modification is entered into and approved by this honorable Court and Debtor's first required payment, under the final modification is made thereby permitting the terms to be implemented, Respondent shall file an Amended Proof of Claim and Debtor shall file a corresponding Amended Plan within thirty (30) days of the Court Order approving the modification.
7. The parties further agree that in the event of any future default by the Debtor under the terms or the Forbearance Agreement, and the loan documents including but not limited to, Note and/or Mortgage, Respondent shall file a Motion for Relief from the Automatic Stay.
8. Debtor may seek a moratorium on current payments to the Chapter 13 Trustee under the current approved bankruptcy plan during the pendency of the Trial Payment Plan.

/s/ Jill Manuel-Coughlin

Jill Manuel-Coughlin, Esq.  
Attorney for Respondent

No Objection - Without  
Prejudice to Any Trustee  
Rights or Remedies

/s/ Paul AR Stewart

Paul AR Stewart, Esq.  
Attorney for Debtor

/s/ LeeAne O. Huggins  
Office of the Chapter 13  
Standing Trustee  
January 7, 2022

  
Magdeline D. Coleman  
Magdeline D. Coleman  
Chief U.S. Bankruptcy Judge

January 12, 2022